

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

UNITED STATES OF AMERICA

*ex rel.* John King & Tammy Drummond  
and John King & Tammy Drummond,  
Individually, *et al.*

Plaintiffs,

v.

SOLVAY S.A. *et al.*,

Defendants.

§  
§  
§  
§  
§ CIVIL ACTION No.  
§ 06-2662  
§ TRANSFERRED  
§ FROM EASTERN  
§ DISTRICT OF  
§ PENNSYLVANIA  
§  
§ CIVIL ACTION No.  
03-3561

**SUPPLEMENTAL DECLARATION OF JOHN KING**

I, John King, declare as follows:

1. Today I have read the declaration signed on this date by Lori King, my former wife, in the above-captioned case.
2. In her declaration, she details her attempts in the spring and summer of 2002 to report to FDA the allegations of fraud that Tammy Drummond and I eventually filed in this case. She also details that she listened to at least 10 to 12 conversations that I had with one or more criminal FDA agents beginning in August 2002 about these allegations.
3. At the time of my previous declaration, I had completely forgotten about these conversations. It is unbelievably frustrating to me to have forgotten them. I know that I have been asked by Berg & Androphy attorneys multiple times about my communications with the government over the last several months in particular, and yet I could not remember these conversations. I have no reason to think that I ever told Tammy Drummond of these conversations, either.
4. After reading Lori's declaration, my memory is somewhat refreshed, but I believe Lori's memory to be superior to mine. In the spring and summer of 2002, immediately following my termination, my depression had worsened to the point that I was not functioning well at all, and without Lori's initiative I never would have persisted in reaching appropriate FDA agents to investigate the case. I have to think that my depression affected my memory as well.
5. I am over the age of 18 years, and I am mentally competent to make this declaration.
6. I declare under penalty of perjury that the foregoing is true and correct.

3/12/2015  
Dated

John King